

**EXHIBIT 2**

**TO**

**PLAINTIFF'S**

**AMENDED AND RESTATED COMPLAINT**

## CHARGE OF DISCRIMINATION

Case 3:05-cv-00398-CSC

Document 17-4

AGENCY

CHARGE NUMBER

Filed 06/16/2005

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This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form.

FEPA

X EEOC

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Amy D. Shoemake

HOME TELEPHONE (Include Area Code)

706.518.5180

STREET ADDRESS

CITY, STATE AND ZIP CODE

1816 - 68<sup>th</sup> Avenue SW, Lanette, Chambers County, AL 36863

DATE OF BIRTH

10/18/78

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Knauff Insulation

NUMBER OF EMPLOYEES, MEMBERS

Over 15

TELEPHONE (Include Area Code)

334.576.8141

STREET ADDRESS

CITY, STATE AND ZIP CODE

3502 - 43<sup>rd</sup> Street, SW, Lanett, AL 36263

COUNTY

Chambers

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

RACE COLOR X SEX HARASSMENT

RELIGION NATIONAL ORIGIN X RETALIATION

AGE

DISABILITY

OTHER (Specify)

DATE FIRST or CONTINUING DISCRIMINATION TOOK PLACE  
AND DATE LAST DISCRIMINATION TOOK PLACE (Month/Day/Year):

FIRST:

LAST:

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s):

CHARGE OF DISCRIMINATION

SSN: 419-29-3762

Sex: Female

Race: Caucasian

Please see following page for particulars.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

Amy D. Shoemake

Date Charging Party (Signature)

Amy D. Shoemake

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(Day, month, and year)


EXHIBIT 2

1. My name is Amy D. Shoemake. I began working with ADECO, assigned to Knauff Insulation in Lanette, Alabama, on May 25, 2004, as a production associate.
2. I was initially assigned to the night shift under Ricky Hamilton. Hamilton recommended that I be hired as a full-time employee of Knauff.
3. I was transferred to the day shift and placed under the supervision of Denny Cannon. Cannon sexually harassed me. He asked me to go to West Palm Beach, Florida with him. He asked me to stay in the room with him so it would cost me nothing. Cannon asked me to come to his house. He stated that a co-worker of hers wanted us to "hook up." Other, equally sexually-suggestive comments were made by Cannon.
4. A co-worker, Norman Crow, witnessed these comments made by Cannon to me.
5. To Cannon's overtures, I repeatedly stated that I was not interested and asked him to stop.
6. I called Stephanie (LNU) at ADECO to report Cannon's sexually harassing comments. Stephanie interrupted me in the middle of the report to tell me that Cannon had called her and said that I needed to be laid off. Stephanie then hung up on me.
7. I contacted the Human Resources Department of Knauff to complain about both Cannon and my lay-off. I also called ADECO again to ask for reassignment to Knauff or elsewhere.
8. Neither Knauff nor ADECO have rehired me even knowing that I was laid off at the direct request of Cannon because of my refusal to submit to his sexual suggestions.
9. At all times during my employment with ADECO and Knauff, my performance was at least satisfactory.
10. I was subjected to a sexually hostile working environment by Cannon while employed with Knauff.
11. Upon information and belief, Cannon had been the subject of previous discipline by Knauff because of similar conduct with other females working under his supervision.
12. Knauff allowed me to be assigned to Cannon without adequate supervision even though it knew of Cannon's previous discipline and tendency to sexually harass females reporting to him.
13. Both ADECO and Knauff violated Title VII of the Civil Rights Act of 1964, as amended, by their conduct in subjecting me to a sexually hostile working environment, terminating my employment in retaliation for my complaints, and in failing to rehire me in retaliation for my complaints.
14. Knauff and ADECO retaliated against me because of my complaints of sexual harassment against Cannon in violation of Title VII of the Civil Rights Act of 1964, as amended.

  
AMY D. SHOEMAKE

The foregoing instrument was acknowledged before me this the 21 day of September, 2004, by Amy D. Shoemake.

My commission expires: MY COMMISSION EXPIRES FEB. 2, 2008

  
Notary Public